

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

Jeffrey Traurig  
**TRAURIG LAW LLC**  
One University Plaza, Suite 124  
Hackensack, NJ 07601  
Tel: (646) 974-8650  
E-mail: [jtraurig@trauriglaw.com](mailto:jtraurig@trauriglaw.com)  
*Local Counsel to the Fee Examiner*

Robert J. Keach, Esq. (admitted *pro hac vice*)  
**BERNSTEIN SHUR SAWYER & NELSON, P.A.**  
100 Middle Street  
Portland, ME 04104  
Tel: (207) 774-1200  
Fax: (207) 774-1127  
E-Mail: [rkeach@bernsteinshur.com](mailto:rkeach@bernsteinshur.com)  
*Fee Examiner*

**BERNSTEIN SHUR SAWYER & NELSON, P.A.**  
Letson Douglass Boots, Esq. (admitted *pro hac vice*)  
100 Middle Street  
Portland, ME 04104  
Tel: (207) 774-1200  
Fax: (207) 774-1127  
E-Mail: [lboots@bernsteinshur.com](mailto:lboots@bernsteinshur.com)  
*Counsel to the Fee Examiner*

In Re:  
  
LTL MANAGEMENT LLC,  
  
Debtor

Case No.: 21-30589 (MBK)  
  
Judge: Michael B. Kaplan  
  
Chapter 11

**SUMMARY COVER SHEET FOR  
SECOND INTERIM FEE APPLICATION OF TRAURIG LAW LLC  
FOR ALLOWANCE OF FEES AND EXPENSES AS COUNSEL TO THE FEE  
EXAMINER FOR THE PERIOD JUNE 1, 2022 THROUGH SEPTEMBER 30, 2022**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

Debtor: LTL Management LLC

Applicant: Traurig Law LLC

Case No.: 21-30589-MBK

Client: Counsel to Robert J.  
Keach, Esq., (the "Fee  
Examiner")

Chapter: 11

Case Filed: October 14, 2021  
(the "Petition Date")

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**SECTION 1  
FEE SUMMARY**

Interim Fee Application No. 2 or  Final Fee Application

Summary of Amounts Requested for the Period from June 1, 2022 through September 30, 2022 (the "Compensation Period").

|   | <u>FEES</u>        | <u>EXPENSES</u> |
|---|--------------------|-----------------|
| Total Previous Fees Requested: <sup>1</sup> | <u>\$17,977.50</u> | <u>\$50.00</u>  |
| Total Fees Allowed to Date:                 | <u>\$7,310.00</u>  | <u>\$0.00</u>   |
| Total Retainer (If Applicable):             | <u>\$0.00</u>      | <u>\$0.00</u>   |
| Total Holdback (If Applicable):             | <u>\$2,133.50</u>  | <u>\$50.00</u>  |
| Total Received by Applicant:                | <u>\$15,844.00</u> | <u>\$0.00</u>   |

|   |                           |
|---|---------------------------|
| Fee Total for the Compensation Period:    | <u>\$10,667.50</u>        |
| Disbursement Total:                       | <u>\$ 50.00</u>           |
| <b>Total Fee and Expense Application:</b> | <b><u>\$10,717.50</u></b> |

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<sup>1</sup> Total Previous Fees Requested includes amounts requested in monthly fee statements through September 30, 2022, including the first interim fee application.

## COMPENSATION BY PROFESSIONAL

The attorney(s) who rendered professional services in this chapter 11 case during the Compensation Period:

| Name of Professional:<br><b>Partner/Member</b> | Year Admitted | Hourly Rate | Total Hours Billed | Total Fees  |
|--|---------------|-------------|--------------------|-------------|
| Jeffrey Traurig                                | 1997          | \$425.00    | 25.1               | \$10,667.50 |

The total fees for the Compensation Period are:

| Professionals                            | Blended Rate | Total Hours Billed | Total Fees  |
|--|--------------|--------------------|-------------|
| Partner/Member:                          | \$425.00     | 25.1               | \$10,667.50 |
| <b>Blended Attorney Rate:</b>            | \$425.00     | 25.1               | \$10,667.50 |
| <b>Blended Rate for All Timekeepers:</b> | \$425.00     | 25.1               | \$10,667.50 |
| <b>Total Fees Incurred:</b>              |              | <b>25.1</b>        | \$10,667.50 |

**SUMMARY OF SERVICES BY TASK CODE**

| <b>DESCRIPTION</b>                    | <b>HOURS</b> | <b>AMOUNT</b>      |
|---------------------------------------|--------------|--------------------|
| Case Administration/General           | N/A          | \$--               |
| Employment and Fee Applications       | 12.4         | \$5,270.00         |
| Employment and Fee Reports/Objections | 12.7         | \$5,397.50         |
| <b>Total Fees Requested</b>           | <b>25.1</b>  | <b>\$10,667.50</b> |

**SUMMARY OF DISBURSEMENTS**

| <b>DISBURSEMENTS</b>        | <b>AMOUNT</b>  |
|-----------------------------|----------------|
| CourtSolutions              | \$50.00        |
|                             |                |
| <b>DISBURSEMENTS TOTALS</b> | <b>\$50.00</b> |

I certify under penalty of perjury that the above is true.

Date: November 21, 2022

/s/Jeffrey Traurig  
Jeffrey Traurig

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

Jeffrey Traurig  
**TRAURIG LAW LLC**  
One University Plaza, Suite 124  
Hackensack, NJ 07601  
Tel: (646) 974-8650  
E-mail: [jtraurig@trauriglaw.com](mailto:jtraurig@trauriglaw.com)  
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Robert J. Keach, Esq. (admitted *pro hac vice*)  
**BERNSTEIN SHUR SAWYER & NELSON, P.A.**  
100 Middle Street  
Portland, ME 04104  
Tel: (207) 774-1200  
Fax: (207) 774-1127  
E-Mail: [rkeach@berNSTEINshur.com](mailto:rkeach@berNSTEINshur.com)  
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**BERNSTEIN SHUR SAWYER & NELSON, P.A.**  
Letson Douglass Boots, Esq. (admitted *pro hac vice*)  
100 Middle Street  
Portland, ME 04104  
Tel: (207) 774-1200  
Fax: (207) 774-1127  
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In Re:  
  
LTL MANAGEMENT LLC,  
  
Debtor

Case No.: 21-30589 (MBK)  
  
Judge: Michael B. Kaplan  
  
Chapter 11

**SECOND INTERIM FEE APPLICATION OF TRAURIG LAW LLC  
FOR ALLOWANCE OF FEES AND EXPENSES AS COUNSEL TO THE FEE  
EXAMINER FOR THE PERIOD JUNE 1, 2022 THROUGH SEPTEMBER 30, 2022**

Traurig Law LLC (“Traurig Law”), counsel to the Fee Examiner, Robert J. Keach, Esq. (the “Fee Examiner”), submits its second interim fee application for allowance of fees of \$10,667.50 and expenses of \$50.00 for the period from June 1, 2022 through September 30, 2022 (the “Compensation Period”) in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Retained Professionals* [Dkt. 761] and the *Order Appointing*

*an Independent Fee Examiner and Establishing Procedures* [Dkt. 1922] (together, the “Interim Compensation Order”). In support of this Application, Traurig Law respectfully represents as follows:

1. During the Compensation Period, Traurig Law did not receive any payments or promises of payment from any other source for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this application other than in accordance with the Interim Compensation Order. There is no agreement or understanding between the Traurig Law and any other person, for sharing of compensation to be received for services rendered in this case.
2. The fees and expenses charged by Traurig Law in this case are billed in accordance with its existing billing rates and procedures in effect during the Compensation Period. Such fees and expenses are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable nonbankruptcy cases in a competitive national legal market.
3. Pursuant to Rule 2016-1 of the Local Rules of the United States Bankruptcy Court of New Jersey (the “Local Rules”) and the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses by Attorneys in Larger Chapter 11 Cases, effective November 1, 2013 (the “Guidelines”), included herewith are (a) a schedule setting forth all Traurig Law professionals who have performed services in this chapter 11 case during the Compensation Period, the hourly billing rate charged by Traurig Law for the services performed by such individual, the aggregate number of hours expended in this case during the Compensation Period and fees billed therefor and the year in which each professional was first licensed to practice law, (b) a summary of services by billing category for services rendered by Traurig Law during the Compensation Period, and (c) a schedule setting for the actual and necessary expenses that

Traurig Law incurred during the Compensation Period in connection with the performance of professional services for the Fee Examiner and for which it seeks reimbursement.

4. Traurig Law's itemized time records for professionals performing services for the Fee Examiner during the Compensation Period were attached as Exhibit B to the previously-filed monthly fee applications (the "Prior Monthly Fee Applications"), which exhibits are incorporated herein by reference.

5. The compensation requested in this proceeding is reasonable based on the nature and extent of the services rendered, the size and complexity of this Chapter 11 Case, the time, labor, and special expertise brought to bear on the questions presented, and other related factors.

6. As described in further detail below, during the Compensation Period, the professional services performed by Traurig Law were necessary and appropriate to protect the rights and fulfill the obligations of the Fee Examiner given the nature and complexity of the issues at hand, were in the best interests of the Fee Examiner and other parties in interest, and were performed in an expeditious and efficient manner. As such, Traurig Law submits that the compensation and reimbursement of expenses sought herein is reasonable within the meaning of sections 330 and 331 of the Bankruptcy Code.

7. This application complies with sections 330 and 331 of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), the Interim Compensation Order, the Guidelines, and the Local Rules.

### Background

8. On October 14, 2021 (the "Petition Date"), the Debtor commenced this reorganization case by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Western District of North Carolina (the "NC Bankruptcy Court"). On November 16, 2021, the NC Bankruptcy Court entered an order [Dkt.

416] transferring the case to the District of New Jersey, which referred the case to this Court. The Debtor is authorized to continue to manage its property and operate its business as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.<sup>2</sup>

9. On March 31, 2022, the Court entered the Interim Compensation Order, which, among other things, appointed Robert J. Keach, Esq, as an independent fee examiner.

10. On April 5, 2022 the Court entered an order [Dkt. 1966], attached hereto as Exhibit A, authorizing the retention of Traurig Law as the Fee Examiner's counsel.

11. On July 19, 2022, Traurig Law filed its *First Interim Fee Application of Traurig Law LLC for Allowance of Fees as Counsel to the Fee Examiner for the Period March 24, 2022 through May 31, 2022* [Dkt. 2732]. On September 16, 2022, the Court entered the *Order Allowing First Interim Fee Application of Traurig Law LLC for Allowance of Fees as Counsel to the Fee Examiner for the Period March 24, 2022 through May 31, 2022*, granting first interim allowances of fees in the amount of \$7,310.00 [Dkt 3045].

#### **Prior Monthly Fee Applications and Summary of Services Rendered**

12. As set forth in the Application cover sheet submitted herewith, Traurig Law rendered a total of 25.1 hours of professional services during the Compensation Period, for which it seeks compensation of \$10,667.50.

13. Pursuant to the Interim Compensation Order, Traurig Law filed the following Prior Monthly Fee Applications for the months within the Compensation Period:

- a. For June 1, 2022 through June 30, 2022 -- fees of \$2,635.00 and expenses of \$50.00 [Dkt. 2756];
- b. For July 1, 2022 through July 31, 2022 -- fees of \$3,315.00 [Dkt. 2916];

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<sup>2</sup> This Court has subject matter jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

- c. For August 1, 2022 through August 31, 2022 -- fees of \$2,337.50 [Dkt 3082]; and
- d. For September 1, 2022 through September 30, 2022 -- fees of \$2,380.00 [Dkt 3912];

14. To apprise this Court of the legal services rendered during the Compensation Period, Traurig Law sets forth the following summary. This summary is intended only to highlight certain categories of services in which Traurig Law devoted time and attention on behalf of the Fee Examiner.

(a) Employment and Fee Applications: This category relates to work in connection with the employment retention and fee applications of Traurig Law, Bernstein Shur Sawyer & Nelson, P.A. ("BSSN"), and the Fee Examiner. During the Compensation Period, Traurig Law drafted, reviewed and filed the (i) monthly fee statements for Traurig Law and the first interim fee application for Traurig Law. During the Compensation period, Traurig Law also (i) reviewed and filed monthly fee statements and the first interim fee applications for BSSN and the Fee Examiner. Traurig Law reviewed or drafted, and filed related certificates of services and certificates of no objection in connection with such filings.

Fees: \$5,270.00; Hours: 12.4

(b) Employment and Fee Reports/Objections: This category relates to work in connection with objections and reports regarding the employment retention and fee applications of professionals (other than the Fee Examiner and his professionals) in the Debtor's case. During the Compensation Period, Traurig Law communicated with BSSN and the Fee Examiner on issues regarding the Fee Examiner's interim fee reports and Orders entered by the Court regarding retained professionals' fees. Traurig Law reviewed and filed the Fee Examiner reports for the first interim final fee applications for adjourned professionals and for the second interim final fee report. Traurig Law also attended the hearings on the interim fee applications and reports.

Fees: \$5,397.50; Hours 12.7

15. Each Prior Monthly Fee Application also contained a summary of the activities performed by Traurig Law professionals during the Compensation Period.<sup>3</sup>

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<sup>3</sup> The summaries are qualified in their entirety by reference to the time and services detail attached as Exhibit B to each Prior Monthly Fee Application, which applications and exhibits are incorporated herein by reference.

16. As of the date of this application, no party has objected to any of Traurig Law's Prior Monthly Fee Applications.

**Expenses Incurred By Traurig Law**

17. Section 330 of the Bankruptcy Code authorizes "reimbursement for actual, necessary expenses" incurred by professionals employed in a chapter 11 case. Traurig Law is seeking reimbursement for expenses in the amount of \$50 incurred during the Compensation Period in connection with fees to participate in a hearing telephonically.

**Statement of the Applicant**

18. Pursuant to section C5 of the Guidelines, Traurig Law makes the following statements:

- a. Traurig Law did not agree to any variations from, or alternatives to, its standard or customary billing rates, fees or terms for services that were provided during the Compensation Period.
- b. The fees sought in this application are not in excess of any budgeted amount.
- c. The hourly rates of Traurig Law included in this application have not been varied based on the geographic location of this case.
- d. This application does not include any time or fees related to reviewing, revising or preparing invoices.
- e. This application does not include any rate increases since Traurig Law's retention.

**Conclusion**

19. The fees requested herein by Traurig Law are billed in accordance with its existing billing rates and procedures in effect during the Compensation Period. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable nonbankruptcy cases in a competitive national legal market.

20. No agreement or understanding exists between Traurig Law or any third person for the sharing of compensation.

21. All of the services for which compensation is requested hereunder were rendered at the request of and solely on behalf of the Fee Examiner, and not on behalf of any other entity. In accordance with the Guidelines, the Certification of Jeffrey Traurig is attached hereto as Exhibit B and incorporated herein by reference.

22. WHEREFORE, Traurig Law respectfully requests that, pursuant to the Interim Compensation Order, the Court (a) allow on an interim basis compensation of \$10,667.50 for services rendered by Traurig Law during the Compensation Period and reimbursement of expenses in the amount of \$50 incurred during the Compensation Period, (b) authorize payment of these allowed fees to Traurig Law and (c) grant such other and further relief to Traurig Law as the Court may deem proper.

Dated: November 21, 2022

Respectfully submitted,

/s/ Jeffrey Traurig  
Jeffrey Traurig, Esq.  
TRAURIG LAW LLC  
One University Plaza, Suite 124  
Hackensack, NJ 07601  
Tel: (646) 974-8650  
E-mail: [jtraurig@trauriglaw.com](mailto:jtraurig@trauriglaw.com)

*Local Counsel to the Fee Examiner*

**EXHIBIT A**

Retention Order



**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

Jeffrey Traurig  
**TRAURIG LAW LLC**  
One University Plaza, Suite 124  
Hackensack, NJ 07601  
Tel: (646) 974-8650  
E-mail: [jtraurig@trauriglaw.com](mailto:jtraurig@trauriglaw.com)  
*Proposed Local Counsel to the Fee Examiner*

Order Filed on April 5, 2022  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

In Re:  
  
LTL MANAGEMENT LLC,  
  
Debtor

Case No.: 21-30589 (MBK)  
  
Judge: Michael B. Kaplan  
  
Chapter 11

**ORDER AUTHORIZING RETENTION OF TRAURIG LAW LLC  
AS COUNSEL TO THE FEE EXAMINER**

The relief set forth on the following page two (2) and three (3) is hereby **ORDERED**.

**DATED: April 5, 2022**

A handwritten signature in black ink, appearing to read "Michael B. Kaplan".  
\_\_\_\_\_  
Honorable Michael B. Kaplan  
United States Bankruptcy Judge

(Page 2)

LTL MANAGEMENT LLC

Chapter 11, Case No.: 21-30589 (MBK)

Order Authorizing Retention of Traurig Law LLC As Counsel To The Fee Examiner

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Upon the applicant's, Robert J. Keach (the "Fee Examiner"), request for authorization to retain Traurig Law LLC ("Traurig") as counsel to the Fee Examiner, it is hereby **ORDERED**:

1. The Fee Examiner is authorized to retain Traurig in the professional capacity noted in the Application.

The professional's address is: Traurig Law LLC  
One University Plaza, Suite 124  
Hackensack, NJ 07601

2. As provided in the *Order Appointing an Independent Fee Examiner and Establishing Procedures* [Docket No. 1922, ¶ 13], the "fees and expenses of the Fee Examiner, and any counsel retained pursuant to court order, shall be subject to application and review pursuant to section 330 of the Bankruptcy Code, Bankruptcy Rule 2016, Local Bankruptcy Rule 2016-1, the U.S. Trustee Guidelines, and the Interim Compensation Order, and shall be paid from the Debtor's estate as an administrative expense under section 503(b)(2) of the Bankruptcy Code. The Fee Examiner's expenses and those of any counsel retained pursuant to court order, shall be subject to the information detail requirements set forth in D.N.J. LBR 2016-1."

3. If the professional requested a waiver as noted below, it is  Granted  Denied.

Waiver, under D.N.J. LBR 2014-2(b), of the requirements of D.N.J. LBR 2016-1.

Waiver, under D.N.J. LBR 2014-3, of the requirements of D.N.J. LBR 2016-1 in a chapter 13 case. Payment to the professional may only be made after satisfactory completion of services.

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LTL MANAGEMENT LLC

Chapter 11, Case No.: 21-30589 (MBK)

Order Authorizing Retention of Traurig Law LLC As Counsel To The Fee Examiner

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4. Traurig will only bill 50% for non-working travel and shall not seek the reimbursement of any fees or costs including attorney fees and costs, arising from the defense of any of Traurig's fee applications in this case.
5. Traurig will agree to make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013 (the "U.S. Trustee Guidelines").
6. Traurig will use the billing and expense categories set forth in the US Trustee Guidelines (Exhibit D-1 "Summary of Compensation Requested by Project Category"), among other categories.
7. Traurig will provide any and all monthly fee statements, interim fee applications, and final fee tab applications in "LEDES" or other satisfactory format to the United States Trustee.
8. The effective date of retention is the date the application was filed with the Court.

**EXHIBIT B**

Certification of Jeffrey Traurig

|  |  |
|--|--|
| <p><b>UNITED STATES BANKRUPTCY COURT<br/>DISTRICT OF NEW JERSEY</b></p>  |  |
| <p><b>Caption in Compliance with D.N.J. LBR 9004-1(b)</b></p> <p>Jeffrey Traurig<br/><b>TRAURIG LAW LLC</b><br/>One University Plaza, Suite 124<br/>Hackensack, NJ 07601<br/>Tel: (646) 974-8650<br/>E-mail: <a href="mailto:jtraurig@trauriglaw.com">jtraurig@trauriglaw.com</a><br/><i>Local Counsel to the Fee Examiner</i></p> | <p>Robert J. Keach, Esq. (admitted <i>pro hac vice</i>)<br/><b>BERNSTEIN SHUR SAWYER &amp; NELSON, P.A.</b><br/>100 Middle Street<br/>Portland, ME 04104<br/>Tel: (207) 774-1200<br/>Fax: (207) 774-1127<br/>E-Mail: <a href="mailto:rkeach@bernsteinshur.com">rkeach@bernsteinshur.com</a><br/><i>Fee Examiner</i></p> <p><b>BERNSTEIN SHUR SAWYER &amp; NELSON, P.A.</b><br/>Letson Douglass Boots, Esq. (admitted <i>pro hac vice</i>)<br/>100 Middle Street<br/>Portland, ME 04104<br/>Tel: (207) 774-1200<br/>Fax: (207) 774-1127<br/>E-Mail: <a href="mailto:lboots@bernsteinshur.com">lboots@bernsteinshur.com</a><br/><i>Counsel to the Fee Examiner</i></p> |
| <p>In Re:<br/><br/>LTL MANAGEMENT LLC,<br/><br/>Debtor</p>   | <p>Case No.: 21-30589 (MBK)<br/><br/>Judge: Michael B. Kaplan<br/><br/>Chapter 11</p>  |

**CERTIFICATION OF JEFFREY TRAURIG**

Jeffrey Traurig, under penalty of perjury, certifies as follows:

1. I am the sole member of Traurig Law LLC, I make this certification in accordance with the Local Rules of the United States Bankruptcy Court of New Jersey (the “Local Rules”) regarding the contents of application for compensation.

2. I have read the Second Interim Fee Application of Traurig Law for Allowance of Fees and Expenses as Counsel to the Fee Examiner for the Period from June 1, 2022 through September 30, 2022 (the “Second Interim Application”).<sup>1</sup>

3. The Fee Examiner has been provided with copies of the Second Interim Application and prior monthly fee applications referenced therein.

4. I have reviewed the requirements of the Interim Compensation Order, the Guidelines, and the Local Rules, and I believe the Second Interim Application complies therewith.

Date: November 21, 2022

/s/ Jeffrey Traurig  
Jeffrey Traurig

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<sup>1</sup> Capitalized terms not otherwise defined herein have the meanings given to them in the Second Interim Application.